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December 7, 2021

Hon. Edgardo Ramos
United States District Judge
40 Foley Sq.
New York, New York 10001

Via ECF

Re: Millennial Plastic Surgery PLLC v. James (21-cv-9590(ER))

To the Hon. Edgardo Ramos,

This firm represents Millennial Plastic Surgery PLLC (“Millennial”) in the above-referenced. I write reluctantly in response to Mr. Fulton’s letter.

Shortly before filing the letter, Mr. Fulton’s paralegal called me and requested my consent to the extension. I explained that this was a motion for emergency relief that has been pending for nearly three weeks, and asked if Defendant’s opposition was prepared, such that it could be served and perhaps attached to counsel’s extension request. I did not receive a response, and Ms. Houston simply stated that she would say I opposed the request.

It is clear that this is yet another delay tactic. Mr. Fulton could, as simply as he submitted today’s letter, put Defendant’s Opposition on the record, then finalize its *Pro Hac Vice* motion as the Court considers it.

Finally, it is worth noting that the “additional information” requested by the Court is a Certificate of Good Standing and an attorney affidavit, each of which is clearly stated as required under the local rules and were not filed due to Mr. Fulton’s own error and/or intent, not some unforeseen supplemental information as Mr. Fulton’s letter may suggest.

Accordingly, Plaintiff opposes Defendant’s request, and due to the already significant delays in adjudicating Plaintiff’s emergency requests for relief, order that Defendant’s counsel file Defendant’s opposition by Wednesday, December 8, 2021 as ordered by the Court.

Respectfully Submitted,

/s/
Kevin Kehrli, Esq.